# EXHIBIT "6"

December 11, 2014

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## WATALLE J. VIDRA-HILLER, on behalf of herself and all behalf of herself and all reversible for the plaintiff of herself and all behalf of herself and all reversible for the plaintiff of herself and all behalf of herself and all reversible for the plaintiff of herself and all behalf of herself and all persons and plaintiff of herself and all persons and perso		Page 1	
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Solution   Colore   Plaintiff   Plaintif		behalf of herself and all CIVIL ACTION	5 By Mr. Schwartz 228
For the Plaintiff: Full Terrange Age of the Plaintiff: Full Terran	5	others similarly situated, NO. 13-cv-01847(JS)	6
NIDLAND FUNDING, LLC   Defendants.   September   Lecture   Laura   L	6	Plaintiff, CLASS ACTION	7
December 11, 2014  December 11, 2014  December 11, 2014  December 11, 2014  December 12, 2014  December 13, 2014  December 14, 2014  December 15, 2014  December 15, 2014  December 16, 2014  December 17, 2014  December 17, 2014  December 18, 2014  December 19,	7	vs.	
and MIDLAND FUNDING, LLC Defendants.  VIDEOTAPED DEPOSITION OF 11 Deposition to Defendant Midland Credit Management (Credit Management)	В	MIDLAND CREDIT MANAGEMENT	9 NUMBER DESCRIPTION PAGE
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Exhibit 5 Answer to Plaintiff's Amended Class Complaint with Affirmative Defenses by Defendant Midland Funding, LLC Class Complaint with Affirmative Defenses by Defendant Midland Funding, LLC Exhibit 6 Letter dated 4/13/12 to Ms. Vidra 41 from MCM  San Diego, California  Lynne E. Moodward, CSR No. 10440  Page 2  APPEARANCES:  For the Plaintiff: FULTTER LORENZ THEODORE E. LORENZ, ESQ. 450 North Narberth Avenue, Suite 101 Narberth, Pennsylvania 19072 6 610.266.7863 Jorenz@consumerslaw.com For the Defendants: MARSHALL DENNEHEY WARNER COLEMAN & GOGGIN ANDREW M. SCHWARTZ, ESQ. 2000 Market Street Philadelphia, Pennsylvania 19103 21 Exhibit 10 Issuer Information Exhibit 10 Issuer Information Exhibit 10 Issuer Information Exhibit 10 Issuer Information Exhibit 10 Securities and Exchange The Defendants: MARSHALL DENNEHEY WARNER COLEMAN & GOGGIN ANDREW M. SCHWARTZ, ESQ. 2000 Market Street Philadelphia, Pennsylvania 19103 21 Exhibit 17 MCM correspondence to 170 Dear TDFMW  Exhibit 17 MCM correspondence dated 191 Exhibit 18 Discretiff Address Change Service 188 Exhibit 19 MCM correspondence to 170 Dear TDFMW  Exhibit 10 Issuer Information 148 Exhibit 11 MCM correspondence to 170 Dear TDFMW  Exhibit 10 Issuer Information 148 Exhibit 11 MCM correspondence to 170 Dear TDFMW  Exhibit 10 MCM correspondence dated 191 Exhibit 11 MCM correspondence to 170 Dear TDFMW  Exhibit 10 MCM correspondence dated 191 Exhibit 10 John Smith 191 Exhibit 11 MCM correspondence to 170 Dear TDFMW  Exhibit 10 Issuer Information 148 Exhibit 11 J3/1 to John Smith 191 Exhibit 11 MCM correspondence dated 191 Exhibit 11 MCM correspondence to 170 Dear TDFMW  Exhibit 12 Defendant Midland Fred 189 Exhibit 20 Direct Marketing Group, Master 205 Exhibit 21 Defendant Midland Credit 209 Management, Inc.'s Answers	16		17
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For the Defendants:  MARSHALL DENNEHEY WARNER COLEMAN & GOGGIN ANDREW M. SCHWARTZ, ESQ. 2000 Market Street Philadelphia, Pennsylvania 19103 215.575.2765 amschwartz@mdwcg.com The Videographer: LAURA VELASCO  Also in Attendance: M. CHRISTOPHER JHANG Senior Corporate Counsel    Coleman Statement of Work correspondence to Dear <tdfnm>   Exhibit 16 Address Change Service   188    </tdfnm>	4	APPEARANCES:  For the Plaintiff: FLITTER LORENZ THEODORE E. LORENZ, ESQ. 450 North Narberth Avenue. Suite 101	1 INDEX TO EXHIBITS (Continued) 2 NUMBER DESCRIPTION PAGE 3 Exhibit 10 Issuer Information 148 4 Exhibit 11 Securities and Exchange 141 Commission Form 10-K, Encore Capital Group, Inc.
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For the Detendants: MARSHALL DENNEHEY WARNER COLEMAN & GOGGIN ANDREW M. SCHWARTZ, ESQ. 2000 Market Street Philadelphia, Pennsylvania 19103 215.575.2765 amschwartz@mdwcg.com The Videographer: LAURA VELASCO  Also in Attendance: M. CHRISTOPHER JHANG Senior Corporate Counsel  ANDREW M. SCHWARTZ, ESQ. 2000 Market Street Philadelphia, Pennsylvania 19103 215.575.2765 Exhibit 17 MCM correspondence dated 191 1/3/11 to John Smith Exhibit 18 Statement of Work for Midland Credit Management Return Mail Process Exhibit 19 PSC Info Group, Automated Document Processing and Mailing Agreement, with attachments  Exhibit 20 Direct Marketing Group, Master Service Agreement Exhibit 21 Defendant Midland Credit Management, Inc.'s Answers	5	APPEARANCES:  For the Plaintiff: FLITTER LORENZ THEODORE E. LORENZ, ESQ. 450 North Narberth Avenue, Suite 101 Narberth, Pennsylvania 19072 610.266.7863	1 INDEX TO EXHIBITS (Continued) 2 NUMBER DESCRIPTION PAGE 3 Exhibit 10 Issuer Information 148 4 Exhibit 11 Securities and Exchange Commission Form 10-K, Encore Capital Group, Inc. 6 Exhibit 12 Chase Visa account summary 7 Exhibit 13 Chase Bill of Sale dated 156 3/15/11, with attached closing statement
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COLEMAN & GOGGIN ANDREW M. SCHWARTZ, ESQ. 2000 Market Street Philadelphia, Pennsylvania 19103 215.575.2765 amschwartz@mdwcg.com  The Videographer: LAURA VELASCO  Also in Attendance: M. CHRISTOPHER JHANG Senior Corporate Counsel  ANDREW M. SCHWARTZ, ESQ. 2000 Market Street Philadelphia, Pennsylvania 19103 215.575.2765 Exhibit 17 MCM correspondence dated 191 1/3/11 to John Smith Exhibit 18 Statement of Work for Midland Credit Management Return Mail Process Exhibit 19 PSC Info Group, Automated Document Processing and Mailing Agreement, with attachments  Exhibit 20 Direct Marketing Group, Master Service Agreement Exhibit 21 Defendant Midland Credit Management, Inc.'s Answers	4 5 6 7	APPEARANCES:  For the Plaintiff: FLITTER LORENZ THEODORE E. LORENZ, ESQ. 450 North Narberth Avenue, Suite 101 Narberth, Pennsylvania 19072 610.266.7863 lorenz@consumerslaw.com For the Defendants:	1 INDEX TO EXHIBITS (Continued) 2 NUMBER DESCRIPTION PAGE 3 Exhibit 10 Issuer Information 148 4 Exhibit 11 Securities and Exchange Commission Form 10-K, Encore Capital Group, Inc. 6 Exhibit 12 Chase Visa account summary 15 7 Exhibit 13 Chase Bill of Sale dated 3/15/11, with attached closing statement 9 Exhibit 14 Object/Operational Placements 16:10 Exhibit 15 MCM correspondence to 170
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The Videographer:  14  LAURA VELASCO  15  16  Also in Attendance:  M. CHRISTOPHER JHANG Senior Corporate Counsel  The Videographer:  17  Document Processing and Malling Agreement, with attachments  18  Exhibit 20 Direct Marketing Group, Master Service Agreement 20  Exhibit 21 Defendant Midland Credit Management, Inc.'s Answers	4 5 6 7 8 9 10	APPEARANCES:  For the Plaintiff:     FLITTER LORENZ     THEODORE E. LORENZ, ESQ.     450 North Narberth Avenue, Suite 101     Narberth, Pennsylvania 19072     610.266.7863     lorenz@consumerslaw.com  For the Defendants:     MARSHALL DENNEHEY WARNER     COLEMAN & GOGGIN     ANDREW M. SCHWARTZ, ESQ.     2000 Market Street     Philadelphia, Pennsylvania 19103     215.575.2765	1 INDEX TO EXHIBITS (Continued) 2 NUMBER DESCRIPTION 3 Exhibit 10 Issuer Information 148 4 Exhibit 11 Securities and Exchange Commission Form 10-K, Encore Capital Group, Inc. 6 Exhibit 12 Chase Visa account summary 7 Exhibit 13 Chase Bill of Sale dated 3/15/11, with attached closing statement 9 Exhibit 14 Object/Operational Placements 10 Exhibit 15 MCM correspondence to Dear <tdfnm> 11 Exhibit 16 Address Change Service 188 12 Exhibit 17 MCM correspondence dated 13 1/3/11 to John Smith 14 Exhibit 18 Statement of Work for Midland Credit Management Return Mail</tdfnm>
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18 Midland Credit Management 19 20 21 to Interrogatories of Plaintiff Natalie J. Vidra-Miller 22 Exhibit 22 Defendant Midland Credit 209 23 Management, Inc.'s Responses to Requests for Production of 24 24 Documents of Plaintiff Natalie J. Vidra-Miller 25 26 27 28 29 20 20 21 22 23 24 25 25	4 5 6 7 8 9 10 11 12 13 14 15	APPEARANCES:  For the Plaintiff:     FLITTER LORENZ     THEODORE E. LORENZ, ESQ.     450 North Narberth Avenue, Suite 101     Narberth, Pennsylvania 19072     610.266.7863     lorenz@consumerslaw.com  For the Defendants:     MARSHALL DENNEHEY WARNER     COLEMAN & GOGGIN     ANDREW M. SCHWARTZ, ESQ.     2000 Market Street     Philadelphia, Pennsylvania 19103     215.575.2765     amschwartz@mdwcg.com  The Videographer:     LAURA VELASCO  Also in Attendance:     M. CHRISTOPHER JHANG	1 INDEX TO EXHIBITS (Continued) 2 NUMBER DESCRIPTION 3 Exhibit 10 Issuer Information 148 4 Exhibit 11 Securities and Exchange Commission Form 10-K, Encore Capital Group, Inc. 6 Exhibit 12 Chase Visa account summary 156 7 Exhibit 13 Chase Bill of Sale dated 3/15/11, with attached closing statement 9 Exhibit 14 Object/Operational Placements 160 Exhibit 15 MCM correspondence to 170 Dear <tdfnm> 11 Exhibit 16 Address Change Service 188 12 Exhibit 17 MCM correspondence dated 1/3/11 to John Smith 14 Exhibit 18 Statement of Work for Midland Credit Management Return Mail Process 16 Exhibit 19 PSC Info Group, Automated Document Processing and Mailing Agreement, with attachments 18 18 Exhibit 20 Direct Marketing Group, Master 205 Service Agreement 19 Exhibit 21 Defendant Midland Credit 209 Exhibit 21 Defendant Midland Credit 209</tdfnm>
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20 21 22 23 Exhibit 22 Defendant Midland Credit 209 23 Management, Inc.'s Responses to Requests for Production of 24 Documents of Plaintiff Natalie J. Vidra-Miller	5 6 7 8 9 10 11 12 13 14 15 16 17	APPEARANCES:  For the Plaintiff:     FLITTER LORENZ     THEODORE E. LORENZ, ESQ.     450 North Narberth Avenue, Suite 101     Narberth, Pennsylvania 19072     610.266.7863     lorenz@consumerslaw.com  For the Defendants:     MARSHALL DENNEHEY WARNER     COLEMAN & GOGGIN     ANDREW M. SCHWARTZ, ESQ.     2000 Market Street     Philadelphia, Pennsylvania 19103     215.575.2765     amschwartz@mdwcg.com  The Videographer:     LAURA VELASCO  Also in Attendance:     M. CHRISTOPHER JHANG     Senior Corporate Counsel	1 INDEX TO EXHIBITS (Continued) 2 NUMBER DESCRIPTION 3 Exhibit 10 Issuer Information 148 4 Exhibit 11 Securities and Exchange Commission Form 10-K, Encore Capital Group, Inc. 6 Exhibit 12 Chase Visa account summary 156 7 Exhibit 13 Chase Bill of Sale dated 3/15/11, with attached closing statement 9 Exhibit 14 Object/Operational Placements 160 10 Exhibit 15 MCM correspondence to 170 11 Exhibit 16 Address Change Service 188 12 Exhibit 17 MCM correspondence dated 1/3/11 to John Smith 14 Exhibit 18 Statement of Work for Midland Credit Management Return Mail Process 16 Exhibit 19 PSC Info Group, Automated Document Processing and Mailing Agreement, with attachments 18 18 Exhibit 20 Direct Marketing Group, Master Service Agreement 209 19 Exhibit 21 Defendant Midland Credit Management, Inc.'s Answers 209
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- Page 61 validation request and the validation notice. We
- 2 give people 45 days to respond to the validation
- 3 notice, we allow for a seven-day grace period as
- 4 well, and once that 52 days has expired, we will then
- 5 make a decision on whether or not we want to send
- what we call the marketing letter, which will give
- the consumers an opportunity to settle their account
- at a reduced balance.
- 9 Q. And the marketing letter is the letter we're looking at here marked as Exhibit 6. Correct? 10
- 11 A. Correct.
- 12 MR. SCHWARTZ: Objection as to form.
- 13 BY MR. LORENZ:
- Q. So that would be the second letter in 14 15 the sequence typically?
- 16 A. This type of letter would be, not 17 necessarily ED01.
- Q. I'm sorry, what was that? 18
- Not necessarily ED01, this letter 19 A.
- 20 template.

12

25

- 21 Q. A form of a marketing letter?
- 22 A. Correct.
- 23 Q. Offering to settle the account?
- 24 A. Correct.
- 25 Q. And what happens after that?

- RevSpring and DMG. Is that correct? 1
- 2 A. Correct.
- 3 Q. Has RevSpring and DMG been in use for a period of years or -- well, let me ask you this: Are
- they still being used today?
  - Α. They are not.
  - Q. When did MCM stop using RevSpring and
- 8 DMG?

6

7

12

- 9 A. RevSpring, we stopped using RevSpring in, I believe, July of last year, July/August time 10
- frame. DMG we stopped in April of 2012.
  - Q. What does DMG stand for?
- 13 A. Direct Marketing Group.
- 14 Q. So DMG was not being used beyond
- 15 April 1, 2012?
- 16 A. It would have been the end of April. I
- believe it's the third week of April. 17
- Q. How come their services were no longer 18
- 19 required?
- 20 A. I joined in October of 2011 and did a
- 21 vendor assessment and determined, after site visits,
- that DMG did not have the capabilities we needed to
- handle the volume, as well as the complexity, of work
- that we wanted to do in the future. 24
- 25 Q. And then you said RevSpring, you

2

3

8

15

20

- A. Throughout the cycle, even during the 2 validation period, if someone makes an agreement to
- pay, we will send production letters, which are a
- 4 payment plan confirmation, as well as notices
- 5 reminding them of the payment being due, we'll send
- 6 the standard letters if they did recurring check or
- debit card payment, we will send them the appropriate
- 8 notifications three to ten days prior to taking any
- 9 money out. If someone misses a payment, we'll send appropriate communication as well, and continue
- calling throughout that life cycle. 11
  - And then the marketing letters, in
- 13 particular, will go on a six-week rotation, so if you
- get this letter today, then six weeks later you'll 15 become eligible again, and we determine whether or
- not we want to send that letter or not.
- 17 Q. Does it make the same offer of 18 resolution or different terms?
- 19 A. Often it's the same. It can get
- 20 progressively better as an account ages, but not 21 always.
- 22 Q. Now, you said before you use mail houses
- 23 to send the letters. Correct?
- 24 A. Correct.
  - Q. In this particular instance you used

- discontinued RevSpring in what period?
  - A. July/August of 2013.
  - Q. And why did you discontinue with them?
- A. They were unable to support some of the 4
- concepts, as well as the costing wasn't adequate from 6 what we wanted.
- 7 Q. And RevSpring is the successor to PSC.
- Is that correct? 9 A. Correct.
- Q. So looking at this letter, we spoke 10
- about the role of the mail house versus your
- department in sending a collection letter. The
- language in this letter, the actual language, who
- 14 provides that language?
  - A. In this case, DMG did.
- Q. So when we look at where it says your, 16
- says Dear Natalie: Your credit report can help you 17
- reach your goals, you're saying DMG proffered that 18
- language? 19
  - A. Correct.
- Q. And did they offer all the language 21
- contained in the body of the letter? 22
  - A. They, they did, with our input.
- 24 Q. And when you say our input, who was the
- 25 actual person providing that input?



# IARED MCCLURE

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	RED MCCLURE		December 11, 2014
VIDRA-MILLER vs. MIDLAND CREDIT			65–68
	Page 65		Page 67
	A. At the time of this being created, it		to scan and determine what account the payment should
2	could have been any of a number of individuals.	2	go to as well, as well as whether or not they
3	Q. Within your group?	3	fulfilled the requirements on the actual acceptance
4	A. Yes.	4	certificate.
5	Q. Could it have been you?	5	Q. Now, just moving up, do you see where it
6	A. Not I wasn't with the company when	6	says Payment Coupon 4? You'll see it says Account
7	this was created.	7	and it has a number after that. Right?
8	Q. Oh, because this was back in 2010?	8	A. Correct.
9	A. Correct.	9	Q. Can you read that account number?
10	Q. All right. If you look at the bottom,	10	A. It is 8539169848.
11	let's just establish, you'll see that, at the bottom	11	Q. And that's an account number assigned to
12	above where it says payment coupon	12	Ms. Vidra. Correct?
13	A. Uh-huh.	13	A. Correct.
14	Q there's a copyright date. Right?	14	Q. Who assigns that account number?
15	2010 Midland Credit Management, all rights reserved.	15	A. MCM.
16	Correct?	16	Q. How does MCM assign that account number?
17	A. Correct.	17	<ul> <li>A. It is sequential based on when we</li> </ul>
18	Q. And you had mentioned that, since 2010,	18	purchase an account. Each account is assigned a
19	there really weren't many changes made to this	19	number which essentially goes in sequence.
20	letter?	20	Q. So each account number is particular for
21	A. Yes.	21	each individual?
22	Q. So if you go to the bottom, the very	22	A. Correct.
23		23	Q. No two individuals have the same account
24	also. You identified ED01. To the right of that	24	number?
25	_	25	MR. SCHWARTZ: Objection as to form.
	Page 66		Page 68
1	A. That is a print code used by DMG in	1	THE WITNESS: Individual or account?
2	order to manage inventory stock.	2	BY MR. LORENZ:
3	Q. What about to the far left?	3	Q. Account. So for instance, this account
4	A. That, I believe, is a number used to	4	number is particular to Natalie J. Vidra. Correct?
5	ensure 100 percent mail requirement, so each letter	5	A. It's actually particular to this
6	is coded with an individual ID, so if it's damaged in	6	account, so if she had multiple accounts, she would
7	the print process, they can determine whether or not	7	actually have two different MCM account numbers.
8	the letter was produced or not.	8	Q. Right. So it's particular to MCM's
9	Q. Okay. And that's	9	efforts to collect this charged off Chase Bank
1 3	G. Okay. And that 3		Choice to concert the charged on chace bank

- Okay. And that's
- 10 A. All for DMG's use.
- 11 Q. All right. So the letter on the bottom
- 12 left, the numbers and, the letters and numbers on the
- bottom left and right beginning with EDUP on the left
- and then ENED you say are DMG numbers?
- 15 A. Correct.
- 16 Q. And the identifier ED01 is an MCM --
- 17 A. That's correct.
  - Q. -- identifier?
- 19 And what above that, there's a number
- beginning with 12 and ending in 7. Do you know what
- that is? 21

18

- 22 A. It's called an OCR lang. I do not know
- 23 what OCR stands for, I believe it's optical device
- 24 recognition, that's used for payment processing. So
- 25 anything goes to a lock box, who then will use that

- unt
- ect?
- would bers.
- 10 account. Is that correct?
- 11 MR. SCHWARTZ: Objection as to form.
- 12 BY MR. LORENZ:
- 13 Q. Is that correct?
- 14 A. Yes, that's correct.
  - Q. And if she had a charged off Bank of
- 16 America account, there would be a separate account
- 17 number?

18

21

- A. Correct.
- 19 Q. And that goes for every individual that
- MCM is trying to collect from. Correct? 20
  - A. Correct.
    - Q. And when is the account number assigned?
- 23 A. It's at the load, so when we talked
- 24 about the initial load to the MCM system, that is
- 25 when the MCM account number is assigned.



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VIDRA-MILLER vs. MIDLAND CREDIT	69-72
Page 69	Page 71
1 Q. What does MCM use that account number	1 there uses to help figure out which account the
2 for?	2 person is calling on?
3 A. We use it for identifying the account,	3 A. We use a call flow. The call flow,
4 so if someone calls in, they must provide the account	4 first piece is making sure we give certain
5 number, as well as personal identifying information	5 disclosures, such as call recording disclosures, and
6 such as last four digits of the Social Security	6 then the next is making sure we identify who the
7 number, date of birth, or other identifying	7 consumer is. One of the things that we take into
8 information so we can track it properly.	8 account is, we don't want to do any third-party
9 The issue we ran into with account	9 disclosure, so we will take an MCM account number
10 numbers is, we buy from a variety of different	10 with the last four digits of the Social Security
	_
11 issuers, as well as debt types, and if you use	11 number.
12 original account numbers, they begin to repeat, so we	12 Q. Would that be sufficient?
13 had to create our own customized internal account	13 A. That would be sufficient.
14 number.	14 Q. Okay. What other combination?
15 Q. When you say the original account	15 A. If you wanted to provide your full
16 number, you mean the original Chase Bank USA accoun-	16 Social Security number and consumer name, that would
17 number?	17 be acceptable as well. You can also provide the MCM
18 A. That's correct.	18 account number with date of birth as well. But in
19 Q. Those numbers, you determined, start to	19 each of the cases you have to have at least two
20 repeat?	20 pieces of information to authenticate identity.
21 A. Yes.	21 Q. Okay. Just moving up here, we looked
22 Q. So now an MCM account number is assigned	22 at that copyright line, and then to the right the
23 at the time the portfolio comes through Midland	23 identifier ED01 is there again. Correct?
24 Funding into MCM. Correct?	24 A. Correct.
25 A. Correct.	25 Q. And in parentheses it says 0710, closed
Page 70	Page 72
1 Q. And if an individual calls in, they have	1 paren. Correct?
1 Q. And if an individual calls in, they have 2 to give you that account number to look up the	<ul><li>1 paren. Correct?</li><li>2 A. That's correct.</li></ul>
1 Q. And if an individual calls in, they have 2 to give you that account number to look up the 3 account. Is that correct?	<ul> <li>1 paren. Correct?</li> <li>2 A. That's correct.</li> <li>3 Q. Does that refer to July 2010?</li> </ul>
1 Q. And if an individual calls in, they have 2 to give you that account number to look up the 3 account. Is that correct? 4 MR. SCHWARTZ: Objection as to form.	<ul> <li>1 paren. Correct?</li> <li>2 A. That's correct.</li> <li>3 Q. Does that refer to July 2010?</li> <li>4 A. It does.</li> </ul>
1 Q. And if an individual calls in, they have 2 to give you that account number to look up the 3 account. Is that correct? 4 MR. SCHWARTZ: Objection as to form. 5 MR. LORENZ: I'm not done yet.	<ol> <li>paren. Correct?</li> <li>A. That's correct.</li> <li>Q. Does that refer to July 2010?</li> <li>A. It does.</li> <li>Q. And then moving up on the right-hand</li> </ol>
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1 Q. And if an individual calls in, they have 2 to give you that account number to look up the 3 account. Is that correct? 4 MR. SCHWARTZ: Objection as to form. 5 MR. LORENZ: I'm not done yet. 6 BY MR. LORENZ: 7 Q to look up that account. Correct? 8 A. That's one of the many pieces required. 9 Q. Okay. Well, I want to know exactly 10 what's, what you say is required. The account number 11 is definitely required. Correct? 12 A. It can be. So we'll take any number of 13 pieces of information. So 14 (Reporter request.) 15 THE WITNESS: Pieces of information. 16 BY MR. LORENZ: 17 Q. Now, when you say we, do you mean so	1 paren. Correct? 2 A. That's correct. 3 Q. Does that refer to July 2010? 4 A. It does. 5 Q. And then moving up on the right-hand 6 side it speaks to you'll see where it says Current 7 Owner? 8 A. Yes. 9 Q. And is it accurate that's Midland 10 Funding, LLC. Right? 11 A. That's correct. 12 Q. And then below that is the MCM account 13 number. Correct? 14 A. Correct. 15 Q. And that's the same account number that 16 you looked at below. Right? 17 A. Yes, it is.
1 Q. And if an individual calls in, they have 2 to give you that account number to look up the 3 account. Is that correct? 4 MR. SCHWARTZ: Objection as to form. 5 MR. LORENZ: I'm not done yet. 6 BY MR. LORENZ: 7 Q to look up that account. Correct? 8 A. That's one of the many pieces required. 9 Q. Okay. Well, I want to know exactly 10 what's, what you say is required. The account number 11 is definitely required. Correct? 12 A. It can be. So we'll take any number of 13 pieces of information. So 14 (Reporter request.) 15 THE WITNESS: Pieces of information. 16 BY MR. LORENZ: 17 Q. Now, when you say we, do you mean so 18 if, if a consumer calls in, after receiving this	1 paren. Correct? 2 A. That's correct. 3 Q. Does that refer to July 2010? 4 A. It does. 5 Q. And then moving up on the right-hand 6 side it speaks to you'll see where it says Current 7 Owner? 8 A. Yes. 9 Q. And is it accurate that's Midland 10 Funding, LLC. Right? 11 A. That's correct. 12 Q. And then below that is the MCM account 13 number. Correct? 14 A. Correct. 15 Q. And that's the same account number that 16 you looked at below. Right? 17 A. Yes, it is. 18 Q. On the bottom left-hand side?
1 Q. And if an individual calls in, they have 2 to give you that account number to look up the 3 account. Is that correct? 4 MR. SCHWARTZ: Objection as to form. 5 MR. LORENZ: I'm not done yet. 6 BY MR. LORENZ: 7 Q to look up that account. Correct? 8 A. That's one of the many pieces required. 9 Q. Okay. Well, I want to know exactly 10 what's, what you say is required. The account number is definitely required. Correct? 11 A. It can be. So we'll take any number of 12 pieces of information. So 13 pieces of information. So 14 (Reporter request.) 15 THE WITNESS: Pieces of information. 16 BY MR. LORENZ: 17 Q. Now, when you say we, do you mean so 18 if, if a consumer calls in, after receiving this 19 marketing letter, calls in, you're getting a call	1 paren. Correct? 2 A. That's correct. 3 Q. Does that refer to July 2010? 4 A. It does. 5 Q. And then moving up on the right-hand 6 side it speaks to you'll see where it says Current 7 Owner? 8 A. Yes. 9 Q. And is it accurate that's Midland 10 Funding, LLC. Right? 11 A. That's correct. 12 Q. And then below that is the MCM account 13 number. Correct? 14 A. Correct. 15 Q. And that's the same account number that 16 you looked at below. Right? 17 A. Yes, it is. 18 Q. On the bottom left-hand side? 19 A. Yes, it is.
1 Q. And if an individual calls in, they have 2 to give you that account number to look up the 3 account. Is that correct? 4 MR. SCHWARTZ: Objection as to form. 5 MR. LORENZ: I'm not done yet. 6 BY MR. LORENZ: 7 Q to look up that account. Correct? 8 A. That's one of the many pieces required. 9 Q. Okay. Well, I want to know exactly 10 what's, what you say is required. The account number 11 is definitely required. Correct? 12 A. It can be. So we'll take any number of 13 pieces of information. So 14 (Reporter request.) 15 THE WITNESS: Pieces of information. 16 BY MR. LORENZ: 17 Q. Now, when you say we, do you mean so 18 if, if a consumer calls in, after receiving this 19 marketing letter, calls in, you're getting a call 20 center somewhere. Correct?	1 paren. Correct? 2 A. That's correct. 3 Q. Does that refer to July 2010? 4 A. It does. 5 Q. And then moving up on the right-hand 6 side it speaks to you'll see where it says Current 7 Owner? 8 A. Yes. 9 Q. And is it accurate that's Midland 10 Funding, LLC. Right? 11 A. That's correct. 12 Q. And then below that is the MCM account 13 number. Correct? 14 A. Correct. 15 Q. And that's the same account number that 16 you looked at below. Right? 17 A. Yes, it is. 18 Q. On the bottom left-hand side? 19 A. Yes, it is. 20 Q. This letter is signed by D. Manning.
1 Q. And if an individual calls in, they have 2 to give you that account number to look up the 3 account. Is that correct? 4 MR. SCHWARTZ: Objection as to form. 5 MR. LORENZ: I'm not done yet. 6 BY MR. LORENZ: 7 Q to look up that account. Correct? 8 A. That's one of the many pieces required. 9 Q. Okay. Well, I want to know exactly 10 what's, what you say is required. The account number 11 is definitely required. Correct? 12 A. It can be. So we'll take any number of 13 pieces of information. So 14 (Reporter request.) 15 THE WITNESS: Pieces of information. 16 BY MR. LORENZ: 17 Q. Now, when you say we, do you mean so 18 if, if a consumer calls in, after receiving this 19 marketing letter, calls in, you're getting a call 20 center somewhere. Correct? 21 A. Correct.	1 paren. Correct? 2 A. That's correct. 3 Q. Does that refer to July 2010? 4 A. It does. 5 Q. And then moving up on the right-hand 6 side it speaks to you'll see where it says Current 7 Owner? 8 A. Yes. 9 Q. And is it accurate that's Midland 10 Funding, LLC. Right? 11 A. That's correct. 12 Q. And then below that is the MCM account 13 number. Correct? 14 A. Correct. 15 Q. And that's the same account number that 16 you looked at below. Right? 17 A. Yes, it is. 18 Q. On the bottom left-hand side? 19 A. Yes, it is. 20 Q. This letter is signed by D. Manning. 21 Who is that?
1 Q. And if an individual calls in, they have 2 to give you that account number to look up the 3 account. Is that correct? 4 MR. SCHWARTZ: Objection as to form. 5 MR. LORENZ: I'm not done yet. 6 BY MR. LORENZ: 7 Q to look up that account. Correct? 8 A. That's one of the many pieces required. 9 Q. Okay. Well, I want to know exactly 10 what's, what you say is required. The account number 11 is definitely required. Correct? 12 A. It can be. So we'll take any number of 13 pieces of information. So 14 (Reporter request.) 15 THE WITNESS: Pieces of information. 16 BY MR. LORENZ: 17 Q. Now, when you say we, do you mean so 18 if, if a consumer calls in, after receiving this 19 marketing letter, calls in, you're getting a call 20 center somewhere. Correct?	1 paren. Correct? 2 A. That's correct. 3 Q. Does that refer to July 2010? 4 A. It does. 5 Q. And then moving up on the right-hand 6 side it speaks to you'll see where it says Current 7 Owner? 8 A. Yes. 9 Q. And is it accurate that's Midland 10 Funding, LLC. Right? 11 A. That's correct. 12 Q. And then below that is the MCM account 13 number. Correct? 14 A. Correct. 15 Q. And that's the same account number that 16 you looked at below. Right? 17 A. Yes, it is. 18 Q. On the bottom left-hand side? 19 A. Yes, it is. 20 Q. This letter is signed by D. Manning.

24 operations team.

Q. Was he still there in 2012?

25



Q. And is there a script that the person

A. That's right.

24

## JARED MCCLURE

December 11, 2014 73–76

VII	DRA-MILLER vs. MIDLAND CREDIT		7	3–76
	Page 73		Pr	age 75
1	A. That I do not know.	1	, 9	You
2	Q. Is he still there now?	2		
3	A. He is not.	3	MR. LORENZ: Yeah. Well, I'm referring to	
4	Q. You don't know when he left?	4	Midland Credit Management and this letter	
5	A. I do not.	5	MR. SCHWARTZ: Thank you.	
6	Q. If you wanted to find that out, who	6	MR. LORENZ: that they send out.	
7	would you ask?	7	MR. SCHWARTZ: Thank you.	
8	<ol> <li>I would have to go to HR.</li> </ol>	8	BY MR. LORENZ:	
9	Q. I would ask that you do that and provide	9	<ul> <li>Q. Again, you send this letter out on</li> </ul>	
10	that information to your attorney. I will follow up	10	behalf of Midland Funding though. Correct?	
11	with Mr. Schwartz.	11	<ul> <li>A. We are working on behalf of Midland</li> </ul>	
12	Obviously Mr. Manning did not review	12	Prunding, but we send it, Midland Credit Managem	nent is
13	each of these letters and sign them. Correct?	13	the one who actually sends it out and	
14	A. That's correct.	14	Q. I understand that, but it's sent out	
15	Q. It's a signature that's just affixed by	15	because you're trying to collect an account owned	d by
16		16	6 Midland Funding. Correct?	
17	g .	17	A. Correct.	
18		18	Q. When money comes in on an account, h	ow
19	· ·	19	_ · · · · · · · · · · · · · · · · · · ·	
20		20		
21		21		am
22		22	and they process the payments.	
23		23		
24	, , ,	24		
25		25		
	Page 74		D	age 76
1	A. Your past due balance of \$2,108.84 with	1		
2	Chase Bank USA, N.A. is being reported to the credit	1		
3	reporting bureaus and a remaining and remains a	3		
4	negative item on your credit report.	4		
5	Q. That sentence, who's reporting to the	5		
6	credit bureau?	6		
7	A. Midland Funding.	7		
8	Q. Is Chase Bank reporting it?	8	-	
9	A. They are not.	9	·	
10	-	10		
11	reporting it?	11		
12	. •	12	· ·	CM or
13		13		0.01
14		14	_	
15	required and update it to the credit reporting	15		
16	•	16		
17	<del>-</del>	17		
18	Q. Do you know, in each instance, when this letter goes out that an account is, in fact, being	18		
		19		
19	•	1		
20	A. We do.	20	) A. My understanding is it does.	

Q. 21 And does Midland track the reporting

22 period? 23

24

A. We do.

Q. Now, you said --

25 MR. SCHWARTZ: I'm sorry, just for clarity, Q. And then after that, do you know what --

22 is it then attributed to Encore's books, or do you

23 know how that works?

24 A. It all just goes through the corporate 25 subsidiaries and then is reported based on



#### JARED MCCLURE VIDPA MILLER VS MIDLAND CREDIT

December 11, 2014 81–84

VII	DRA-MILLER vs. MIDLAND CREDIT		81–84
	Page 81		Page 83
1	Q. Okay, just so I'm clear, so up to the	1	completely different than DMG and PSC.
2	third week of April 2012, DMG is responsible for	2	<ul> <li>Q. Did you provide a copy of the letter</li> </ul>
3	design, print, and mailing of this marketing letter.	3	that they proposed?
4	Correct?	4	A. I did not.
5	A. Correct.	5	Q. Do you have a, do you have a template
6	Q. And all the letters for MCM?	6	that they proposed to use or
7	<ul> <li>A. No, only this letter and one or two</li> </ul>	7	A. Not with me.
8	other templates DMG handled. The rest were handled	8	Q. Can you provide that?
9	by RevSpring.	9	A. I can.
10	<ul> <li>Q. And this particular template, the ED01,</li> </ul>	10	<ul> <li>Q. I ask that you provide that to</li> </ul>
11	then PSC, which became RevSpring, was involved with	11	Mr. Schwartz.
12	handling the return mail?	12	So the Nahan template doesn't have, as
13	A. Correct.	13	you said, the bar code up top. Is that correct?
14	<ul> <li>Q. And that was all the way through the</li> </ul>	14	A. Correct.
15	2013 time frame until their services were cut in July	15	<ul> <li>Q. And what changed in the, in the address</li> </ul>
16	or August?	16	line?
17	<ul> <li>A. Except for marketing which moved to</li> </ul>	17	<ul> <li>A. The address line they changed to be</li> </ul>
18	Nahan, and Nahan handled return mail and print	18	simply the name and address. This bar code that they
19	production for marketing after that period.	19	have above Natalie's name here moved to the bottom
20	Q. After which period?	20	Q. Okay.
21	A. After the third week of April, so all of	21	<ul> <li>A and they used what's called an</li> </ul>
22	the marketing letters that Nahan produced, Nahan	22	intelligent mail bar code, which goes both up and
23	handled return mail, and then PSC handled anything	23	down, and then anything above that bar code is now
24	that they produced or anything that was trailing off	24	removed.
25	from DMG's prior work.	25	<ul> <li>Q. So all the numbers above that bar code</li> </ul>
-	Page 82		Page 84
1	Q. Okay. So the bulk of the mailings	1	are gone?
2	related to this ED01 marketing letter were then taken	2	A. Correct.
3	over by Nahan in the third week of April 2012?	3	Q. And when did that happen?
4	A. Correct.	4	<ul> <li>A. The third week of April 2012 for the</li> </ul>
5	Q. Beginning to end?	5	marketing letters at Nahan.
6	A. What	6	<ul> <li>Q. Just so I'm clear, RevSpring continued</li> </ul>
7	Q. They were handling the return?	7	to send letters though. Is that right?
8	A. Yes.	8	A. They did.
9	Q. They were handling the mailing	9	<ul> <li>Q. And send this template of letter, the</li> </ul>
10	A. Beginning to end.	10	ED01?
11	Q as well as the return mail?	11	<ul> <li>A. They did not send this template after</li> </ul>
12	A. Correct.	12	that period.
13	Q. Who is the contact at Nahan Printing?	13	Q. After April 2012?
14	A. Pat Nahan.	14	A. Correct.
15	Q. And you say they're located in	15	Q. They sent other letters?
16	St. Cloud, Minnesota?	16	A. They did.
147	A 0	17	O The reason Look is because in

17 A. Correct.

18

- Q. This is the first I'm hearing of this
- 19 group. I don't believe they were identified in the
- 20 interrogatory answers.
- 21 A. That's correct.
- 22 Q. How come they weren't identified?
- 23 A. They do not have anything tied to this
- 24 address window, they, that would be relevant, so they
- approached the addressability as well as the layout

- 17 Q. The reason I ask is because, in
- 18 discovery we asked to, we asked for the
- identification of, or the amount of letters that went
- out during the class period, and we've been provided
- 21 the number 3,681. Are you familiar with that number?
  - A. I am.

- 23 Q. How did you determine that number?
- 24 So we worked with a group to pull all
- 25 the individuals who lived in the Philadelphia County



5

8

13

### JARED MCCLURE VIDRA-MILLER vs. MIDLAND CREDIT

December 11, 2014

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Page 88

		Page 85
1	who we	re Chase consumers, and also received this
2	letter in	this format.
3	Q.	What period of time did that cover?

- 4 A. It covered from April 12th, 2012, until
- 5 April 13th, 2013.
- Q. But then in reality, when were these 7 letters actually sent? What was the time frame?
- 8 A. The first time this letter was sent was May 2011, and the last would have been sometime in 10 2014, early 2014, late 2013.
- 11 Q. To members of this class?
- 12 A. No.
- 13 Q. Just generally speaking?
- 14 Generally speaking.
- 15 Q. Because I guess where I'm running into
- 16 confusion is, you say that, when Nahan came in, they took over the sending of this marketing letter, and 17
- that the address line changed and the numbers above
- 19 the individual's name were removed as of the third
- week of April 2012. Correct?
- 21 A. Correct.
- Q. So then who continued to send the letter 22
- 23 out? Who continued sending using this template?
- 24 A. There may have been small volumes that 25 would go out from PSC to use up inventory, but the,

there's a lot of conversation to make sure the data

so for instance, Chase Bank USA versus Chase Bank, we

- 2 opted to include anything with, like Chase, and
- was pulled accurately.
  - Q. Who did the actual inputting of the
- parameters and the pulling of the data?
- 7 A. Matt Anderson.
  - Q. What's his position?
- 9 A. He is a data analyst in our inventory
- 10 management team.
- Q. And were you with him or part of the 11
- process while that was going on? 12
  - I was part of the process.
- Q. So you put in, there were some 14
- 15 limitations in terms of Philadelphia County and Chase
- Bank. Did you say that, was there a limitation put 16
- in if -- was it all letters sent or was it letters.
- did that include all letters sent or did it take out 18
- 19 letters that came back?
- 20 We looked at all letters sent.
- 21 Q. So the 3,681 represents all letters that
- 22 were mailed out?
- 23 A. Correct.
- 24 Q. Regardless of whether they were returned
- 25 or not?

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- 1 most of it would have been simply mailed from, during
- 2 this class period, during April of that year, of
- 3 2012. There was very very little volume, if any, of
- 4 this exact template sent to this class group.
- 5 Q. So that number, the 3,681, is really coming out of the April 2012 time frame?
  - A. Primarily.

7

- 8 Q. How did you, how did you actually do the
- 9 search? Can you describe that for me?
- 10 A. So we have a universal marketing 11 database that stores all letters that have been sent,
- 12 so we track the letter code, the name, address,
- 13 account number of the consumer, we also track the
- 14 original creditor name and a variety of other
- 15 information that goes into the letter itself, and
- 16 then we are able to see what was successfully
- 17 delivered or not based on whether mail was returned,
- 18 and then we simply input the different criteria that
- 19 we're looking for, so if someone takes quite a bit of
- 20 time to kind of program into SAS, which is our
- analytic platform. So they'll build the code up in
- 22 SAS, then they will review the logic and say here is
- 23 how I'm going to pull the data, is this accurate, 24 then they will query the system and look for the data
- 25 that was requested. There's often nuances involved,

- Q. For the class identified, the 3,681,
- have you ever determined how much those accounts were 3
- 4 worth?

2

6

5 A. We have not.

A. Correct.

- Or is that something you're able to do?
- 7 Α. It's something that's very challenging
- 8 to do.
- 9 Q. Why is that?
- A. Because worth is all relative, and you 10
- 11 can look at --
- 12 Q. Well, no, it's not relative. I mean,
- 13 you say that there's X, on this account you say
- 14 there's over 2,000 due. That's not relative, you
- 15 have a number in here. Are you able to take the
- 16 3,681 individuals, look at their balances and tally
- 17 that up?
- 18 A. You can, but when you look at it we're
- offering a 40 percent discount as well as a 20 19
- percent discount, and so it becomes very challenging 20
- 21 to say the total amount we're trying to collect,
- 22 because we offer a variety of options, and so you
- 23 could actually start with the full balance due, but
- 24 we actually never ask for the full balance due in
- 25 this case. Person could accept 40 percent. If they



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### JARED MCCLURE VIDRA-MILLER vs. MIDLAND CREDIT

December 11, 2014 97-100

- 1 A. I did not.
- 2 Q. You'll agree the one that's there today,
- 3 there's no mention of a need for an account number.
- Correct?

5

- A. Correct.
- 6 Q. In fact, the discount only arises out of
- using the actual USPS code that's provided? 7
- 8 A. Correct.
- 9 Q. The bar code below that, what's
- 10 contained within that bar code?
- 11 A. That, my understanding is, for the USPS.
- 12 It indicates zip codes that it's going to and postal
- 13 route information.
- Q. When you said the mail vendor made 14 15 mention of putting the account number in there, are you speaking about DMG or PSC? 16
- 17 A. My understanding it was a request of 18 PSC.
- 19 Q. And how did you arrive at that
- 20 understanding? 21 A. We did discover two documents, one
- 22 created in 2004 and another in 2009, indicating the
- mandatory elements for an address block, and it was 23
- provided by a mail vendor, and the only mail vendor
- 25 we had at both 2004 and 2009 was PSC.
- Page 98
- 1 Q. And you agree that MCM uses window 2 envelopes. Correct?
- 3 A. Correct.
- Q. In other words, you stuff in the letter,
- and this block you can see through the window of the
- envelope. Correct?
- 7 A. Correct.
- 8 Q. All these numbers here, the postal code,
- as well as the MCM account number, is visible through
- the window of the envelope. Correct? 10
- MR. SCHWARTZ: Objection as to form. 11
- 12 BY MR. LORENZ:

14

- 13 Q. Is that correct?
  - A. Could you repeat the question?
- 15 Q. The postal code, as well as the MCM
- account number, is visible through the window of the
- 17 envelope. Correct?
- A. If you mean the MCM account number as 18 the tracking number, yes, that is visible, but you 19 cannot tell that it's the MCM account number purely
- 21 from the outside of the envelope. 22 Q. Why, why do you refer to it as a
- 23 tracking number?
- A. The official definition was a key line 24
  - in our documentation, and it's a tracking number

- Page 99 1 because it has many additional numbers, so it has the
- 2 leading zeroes, it has the pound sign, and then it
- 3 has a check digit added to the end, so we can confirm
- 4 whether or not it is a real piece or authentic item
- that was sent by that vendor.
  - Q. Well, how is that done?
- 7 A. The vendor is the one who adds the check
- 8 digit and they also specify how many records or
- fields, so the leading zeroes was all something that
- 10 was brought on by that group, as well as the check 11 digit.
- Q. Doesn't the vendor really use the bar 12
- code? They just scan the bar code? 13 A. They use the bar --
- MR. SCHWARTZ: Objection as to form. You can 15 16 answer if you can.
- THE WITNESS: They do use the bar code, but 17
- 18 when the bar code does not read, they have to hand
- key information in. And actually, when I did an
- on-site visit, there were a number of instances where
- the bar code was unreadable and they had to hand key.
- 22 BY MR. LORENZ:
- 23 Q. When you say you did an on-site visit,
- 24 where and when was that?
  - A. I did an on-site visit in December of

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- 2011, and then subsequently in, I believe it was April of 2012.
  - Q. And was that with PSC?
  - A. It was with PSC, and as well as DMG was
- about a week before that.
- Q. So where was it that -- it was at the 6 PSC facility where you said there were instances of not being able to read the bar code. Correct?
  - A. It was at PSC, correct.
- 10 Q. Not at DMG?
- 11 Α. Correct.
- Q. And how many pieces of mail did you 12
- 13 review?
- 14 A. I was there for about four hours, and
- actually in the process, the place where they process 15
- return mail, probably only a half hour or so, as they 16
- were going through whatever I saw in a half hour, and 17
- they actually had a large pallet from the USPS that
- was filled with unscannable items. 19
- Q. And when was that that you did this 20
- visit? 21
- 23 Q. Did you do visits in 2012 and 2013?
- A. In 2012, I did not. 2013, I did. 24
  - Q. And did you encounter the same issue?

A. That was from the December 2011 visit.



December 11, 2014 145–148

1	A. Correct.	1	Page 14 SAN DIEGO, CALIFORNIA, THURSDAY, DECEMBER 11, 201
2	Q. Do you agree that Encore's net worth	2	12:54 P.M.
3	exceeds 50 million dollars?	3	
4	A. Yes.	4	THE VIDEOGRAPHER: Going back on the record,
5	Q. The, if you could turn to the page that	5	the time is 11 excuse me, 12:54 p.m.
6	says F-2 at the bottom, you'll see a line for	6	
7	goodwill. That's in excess of 504 million dollars.	7	EXAMINATION RESUMED
8	A. Yes.	8	BY MR. LORENZ:
9	Q. Do you know what constitutes the	9	Q. Okay. So we're back from a brief lunch
10	goodwill?	10	break, Mr. McClure, you have your microphone on.
11	A. Goodwill means we paid more than the	11	Good.
12	•	12	A. Yes.
13	· •	13	Q. Okay. I have in front of you the
14	i	14	amended complaint that we marked earlier and ask that
15		15	
16		16	starting at Paragraph 22.
10 17	•	17	A. Okay.
		18	Q. And then I've also placed in front of
18		19	you what we previously marked as Exhibit 7, the
19	Q. What's the U.K. business? I saw it in	20	excerpt from the class list that was provided in this
20			·
21	A. The U.K. business is Cabot Financial.	21	matter.
22	,	22	And I just wanted to confirm that, if
23	, ,	23	you look at the definition of the class in
24	•	24	Paragraph 22, that those are the parameters that were
25	break?	25	used to generate the list that was provided to us and
	Page 146		Page 14
1	MR. SCHWARTZ: Yeah, sure.	1	there's an excerpt marked as Exhibit 7.
2	MR. LORENZ: Okay. Now is as good a time as	2	A. That's correct.
3	any.	3	<ul> <li>Q. And just look at the second page also,</li> </ul>
4	MR. SCHWARTZ: Okay.	4	because it goes from Paragraph 22.a. through e.
5	THE VIDEOGRAPHER: Going off the record, the	5	A. Yep, that's correct.
6	time is 12:12 p.m.	6	<ul><li>Q. Okay, I'll take those back from you.</li></ul>
7		7	Put them right here. I'll take that one too.
8	(Lunch recess.)	8	(Exhibit 10 marked for identification.)
9		9	BY MR. LORENZ:
10		10	Q. Marked as Exhibit 10
11		11	MR. SCHWARTZ: Let me just put an objection
12		12	just to clarify C, maybe, I mean, just a suggestion,
13		13	
14		14	cards.
15		15	BY MR. LORENZ:
16		16	
17		17	
1 <i>1</i> 18		18	
10		19	
			/1. That's confect.
19			O There's no other there's nothing also
19 20		20	
19 20 21		20 21	on here other than a Chase credit card account.
19 20 21 22		20 21 22	on here other than a Chase credit card account.  A. Correct.
19 20 21 22 23		20 21 22 23	on here other than a Chase credit card account.  A. Correct. Q. Or a Chase account.
19 20 21 22 23 24 25		20 21 22	on here other than a Chase credit card account.  A. Correct. Q. Or a Chase account. MR. SCHWARTZ: Right, but you defined it as

